

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

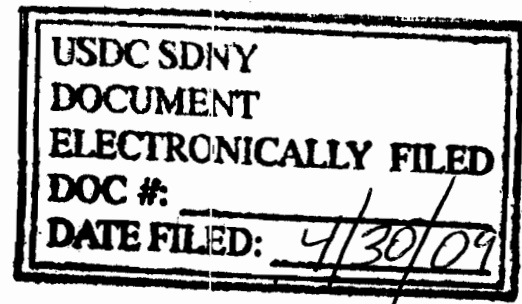
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PATRICIA RASMUSSEN CATALANO, :

Plaintiff, :

-against- :

CLEARSTREAM BANKING, S.A., :

Defendant. :
-----X



**PROPOSED REVISED CIVIL
CASE MANAGEMENT PLAN
AND SCHEDULING ORDER**

07 Civ. 8093(GEL)

After consultation with counsel for all parties, the following Revised Case Management Plan is adopted. This plan is also a scheduling order pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure.

1. The case is to be tried by a jury. Scheduling of pre-trial practice should be arranged with a view to having the case ready for trial within approximately six months of the initial pre-trial conference.
2. All fact discovery is to be completed by June 30, 2009. Interim deadlines set below may be extended by the parties on consent without application to the Court, provided the parties can still meet the discovery completion date ordered by the Court, which shall not be adjourned except upon a showing of extraordinary circumstances.
 - A. Depositions to be completed by June 30, 2009.
 - i. Depositions shall proceed concurrently.
 - ii. No depositions shall be extended beyond two business days without prior leave of the Court.
 - D. Plaintiff's Experts, if any, are to be designated by May 18, 2009, and Defendant's experts, if any, are to be designated by May 25, 2009. Plaintiff's experts' reports are to be served no later than June 1, 2009 and Defendant's experts' reports are to be served no later than June 8, 2009. Experts may be deposed, but such depositions must occur within the time limit set forth for all depositions set forth above.

- E. Requests to Admit, if any, are to be served no later than May 28, 2009.
3. Dispositive motions are to be served and filed by July 29, 2009.
Answering papers are to be served and filed by August 26, 2009.
Reply papers are to be served and filed by September 25, 2009.

All motions and applications shall be governed by the Court's Individual Practice Rules, which are available on the Internet at <http://www.nysd.uscourts.gov>. Note that under those rules, two courtesy copies of all motion papers are to be provided to chambers by the movant at the time the reply is filed. It is the responsibility of the movant to make sure that copies of all parties' papers are provided at that time.

Any party may request oral argument by letter at the time reply papers are filed. Whether or not requested, the Court will determine whether and when oral argument is to be held.

4. The joint pretrial order shall be filed no later than 30 days after completion of discovery, or after the final decision of any dispositive motion, whichever is later, unless a different date is set by order of the Court. The requirements for the pre-trial order and other pre-trial submissions shall be governed by the Court's Individual Practice Rules.
5. Counsel consent to trial by a U.S. Magistrate Judge.

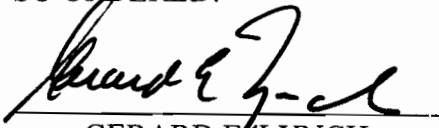
Yes _____ No XX _____

~~NEXT CASE MANAGEMENT CONFERENCE~~ _____

(To be completed by the Court)

Dated: April 23, 2009
New York, New York

SO ORDERED:


GERARD E. LYNCH
United States District Judge